

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CYNTHIA L. MERLINI,

Plaintiff,

v.

CANADA,

Defendants.

Case No. 1:17-cv-10519-NMG

**DEFENDANT'S ASSENTED-TO MOTION FOR EXTENSION OF TIME TO FILE A
RESPONSIVE PLEADING TO PLAINTIFF'S COMPLAINT**

Now comes the Defendant, the Government of Canada, and respectfully moves this Honorable Court pursuant to Fed. R. Civ. P. Rule 6(b) for an extension of time, up to and including June 19, 2017, to file a responsive pleading to the Plaintiff's complaint. Good cause exists to grant the requested extension as Canada only recently retained undersigned counsel to defend it in this litigation and counsel requires additional time to review and determine how to respond to the complaint and to prepare such a response. Plaintiff, through counsel, has consented to the extension requested herein. In further support of this motion, Canada states as follows:

1. The current deadline to respond to the complaint is June 5, 2017.
2. Counsel was not retained to represent Canada in this matter until this week. As of this filing, counsel has not had adequate time to fully evaluate the allegations in the complaint. The complaint raises complex issues involving administrative, state, federal, and international law. Good cause exists to grant the requested extension to allow counsel sufficient time to investigate the matters in the complaint, confer with their client about such matters, and then

determine how to respond and prepare a response to the complaint. That response may take the form of an answer or a motion to dismiss.

3. Canada requests a modest two-week extension of this deadline, making the response due on or before June 19, 2017.

4. Neither party has previously requested an extension of any deadline in this matter.

5. No party will be prejudiced by the requested continuance, and the Plaintiff does not seek preliminary injunctive or other emergency relief. Granting the extension will not delay resolution of this matter, and will not result in the delay of any scheduled hearings.

6. The undersigned hereby certifies, pursuant to L.R., D.Mass. 7.1(a)(2), that counsel for Canada has conferred with Plaintiff's counsel and the Plaintiff consents to the requested extension.

WHEREFORE, Canada respectfully requests that the deadline to respond to the complaint be extended up through and including June 19, 2017.

Respectfully Submitted,
Local Counsel for the Defendant,

/s/ Chrisann Leal

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Certificate of Service

I, Chrisann Leal, hereby certify that a true copy of the above document was served upon the attorney of record for the Plaintiff electronically and by mail on June 2, 2017.

/s/ Chrisann Leal
Chrisann Leal